

Presentment Date: January 4, 2021 at 10:00 a.m. (ET)

Objections Due: December 28, 2020

Hearing Date: To Be Scheduled by the Court

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

ORION HEALTHCORP, INC¹.

Debtors.

HOWARD M. EHRENBERG IN HIS CAPACITY
AS LIQUIDATING TRUSTEE OF ORION
HEALTHCORP, INC., ET AL.,

Plaintiff,

v.

ELENA SARTISON; 2 RIVER TERRACE
APARTMENT 12J, LLC; CLODAGH BOWYER
GREENE A/K/A CLODAGH BOWYER;
ELLIOTT GREENE,

Defendants.

**NOTICE OF PRESENTMENT OF ORDER GRANTING
PLAINTIFF'S MOT'ION FOR SUMMARY JUDGMENT
OR IN THE ALTERNATIVE SUMMARY ADJUDICATION
AGAINST DEFENDANT 2 RIVER TERRACE APARTMENT 12J, LLC**

PLEASE TAKE NOTICE that upon *Plaintiff's Motion for Summary Judgment or in the*

Alternative Summary Adjudication Against Defendant 2 River Terrace Apartment 12J, LLC

1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Orion Healthcorp, Inc. (7246); Constellation Healthcare Technologies, Inc. (0135); NEMS Acquisition, LLC (7378); Northeast Medical Solutions, LLC (2703); NEMS West Virginia, LLC (unknown); Physicians Practice Plus Holdings, LLC (6100); Physicians Practice Plus, LLC (4122); Medical Billing Services, Inc. (2971); Rand Medical Billing, Inc. (7887); RMI Physician Services Corporation (7239); Western Skies Practice Management, Inc. (1904); Integrated Physician Solutions, Inc. (0543); NYNM Acquisition, LLC (unknown) Northstar FHA, LLC (unknown); Northstar First Health, LLC (unknown); Vachette Business Services, Ltd. (4672); Phoenix Health, LLC (0856); MDRX Medical Billing, LLC (5410); VEGA Medical Professionals, LLC (1055); Allegiance Consulting Associates, LLC (7291); Allegiance Billing & Consulting, LLC (7141); New York Network Management, LLC (7168). The corporate headquarters and the mailing address for the Debtors listed above is 1715 Route 35 North, Suite 203, Middletown, NJ 07748.

[Docket No. 42] (the “Motion”), which Motion includes the reasons underlying the relief requested, Plaintiff, Howard M. Ehrenberg in his capacity as Liquidating Trustee of Orion Healthcorp, Inc., et al., (the “Plaintiff” or the “Liquidating Trustee”) will present the Revised Proposed *Order Granting Plaintiff’s Motion for Summary Judgment or in the Alternative Summary Adjudication Against Defendant 2 River Terrace Apartment 12J, LLC* attached to the Affidavit of Jeffrey P. Nolan in Support of Motion for Summary Judgment or in the Alternative Summary Adjudication Against Defendant 2 River Terrace Apartment 12J, LLC [Docket No. 44] (the “Revised Proposed Order”) attached hereto as **Exhibit A**, to the Honorable Alan S. Trust, United States Bankruptcy Judge, in Courtroom 960 of the United States Bankruptcy Court for the Eastern District of New York, 290 Federal Plaza, Central Islip, NY 11722 on January 4, 2021 at 10:00 a.m. (prevailing Eastern Time). Please find attached as **Exhibit B**, a blackline version of the Revised Proposed Order. This version shows all of the changes that were made to the original order attached as **Exhibit N** to the Nolan Affidavit.

PLEASE TAKE FURTHER NOTICE that that any responses or objections (“Objections”) to the relief requested in the Motion, if any, must conform with the Bankruptcy Code and the Bankruptcy Rules, shall be in writing, shall set forth the nature of the objector’s interest in the Debtors’ Estates and the reasons and legal basis for the objection, and be served upon counsel for the Plaintiff, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, New York 10017-2024 (Attn.: Jeffrey P. Nolan, Esq.), no later than **December 28, 2020** (the “Objection Deadline”). The objection and proof of service shall be filed at least seven (7) days prior to the date set for the presentment of the proposed order.

PLEASE BE ADVISED THAT IF AN OBJECTION IS TIMELY FILED TO THE RELIEF REQUESTED, OR IF THE COURT DETERMINES THAT A HEARING IS APPROPRIATE, THE COURT WILL SCHEDULE A HEARING. NOTICE OF SUCH A HEARING WILL BE PROVIDED BY THE LIQUIDATING TRUSTEE.

Dated: New York, New York
December 3, 2020

/s/ Jeffrey P. Nolan

Ilan D. Scharf, Esq.

Jeffrey P. Nolan, Esq. (admitted *pro hac vice*)

PACHULSKI STANG ZIEHL & JONES LLP

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Counsel for the Plaintiff,

Howard M. Ehrenberg in his capacity as

Liquidating Trustee of Orion Healthcorp, Inc., *et al.*